

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

ADELINA BLANKENSHIP

Plaintiff

v.

YESENIA LASSITER

Defendant

Docket No. 1:23-cv-1328

**SECOND DECLARATION OF ADELINA BLANKENSHIP**

I, Adelina Blankenship, declare that if called to testify, I would testify to the best of my information and belief as follows:

1. I have personal knowledge of all facts set forth in this Declaration and, if called upon, could competently testify to those facts. I am over 18 years of age and am qualified to testify.

2. I am a Special Education teacher with Prince William County and I was the case manager at Gainesville Middle School for the individual named as "Daughter" in the complaint in this case and in the course of assisting the Daughter I frequently spoke with the mother of the Daughter, Yesenia Lassiter. I am the lead of the Individualized Education Program for the daughter in the school year 2022-23. The Team includes the Principal of Gainesville Middle School as well as the individual teachers providing education to the Daughter.

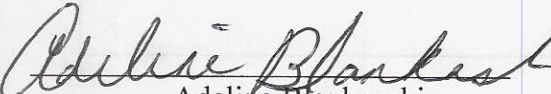
3. As late as October 2023, I was asked to participate in various data collection activities responsive to recent FOIA requests by Defendant.

4. The Defendant guilted a member of my IEP Team to provide her with audiovisual recordings of the IEP meetings because the Defendant claimed to need audiovisual recordings to accommodate a "traumatic brain injury." The Defendant casted this request as her own accommodation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this November 27th, 2023

By:

  
Adelina Blankenship